

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: WILLIAM P. RENN
JODI A. RENN
DEBTORS**

**CHAPTER 13
CASE NO.: 1:18-bk-01735**

MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN

COME NOW the Debtors, William P. Renn and Jodi A. Renn, by and through their Counsel, Nicholas G. Platt, and hereby moves the Court for authority to Modify their Confirmed Chapter 13 Plan, and in support state:

1. On April 25, 2018, Debtors filed a voluntary petition for relief under Title 11, Chapter 13 of the Bankruptcy Code.
2. This Court has jurisdiction over the matters presented herein, which are core in nature, pursuant to 28 U.S.C. 157(b)(2)(A) and (L), 28 U.S.C. 1334, and 11 U.S.C. 1329.
3. On May June 26, 2019 this Court confirmed Debtors' 2nd amended plan of reorganization.
4. A Motion to Dismiss was filed by the Trustee on May 12, 2021 for material default.
5. Debtors have had a material financial hardship related to the coronavirus pandemic and would like to extend their plan by an additional twenty four months to lower their payment. Co-Debtor was out of work for several months due to having high risk health factors and a large Covid-19 outbreak at her place of employment.
6. Debtors respectfully request the Court allow them to modify their Chapter 13 plan.

WHEREFORE, Debtors pray this Court allows them to modify their Chapter 13 plan and for all other just relief to which they are entitled.

Dated: June 10, 2021

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